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July 6, 2006

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PHILADELPHIA

NEW YORK

LOS ANGELES

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CHICAGO

PRINCETON

FLORHAM PARK

BERWYN

WILMINGTON

Via ECFS and Electronic Mail

Ms. Marlene Dortch
Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, SW
Washington, DC 20554

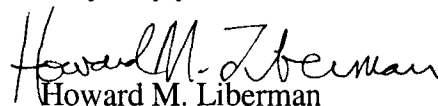
Re: Request for Extension of Time to Construct Full-Power DTV Facilities and
Continuing Special Temporary Authority and Request for Confidential
Treatment, MB Docket 03-15

Dear Ms. Dortch:

Transmitted herewith, on behalf of Mission Broadcasting, Inc. ("Mission"), is a request for extension of time to construct full-power digital facilities for the television stations listed on Attachment 1 to the letter attached hereto. Mission's request contains proprietary information regarding its various contracts as well as detailed financial information regarding the cost of its DTV build-out. Although general financial and DTV-related information is available in Mission's Securities and Exchange Commission filings, the specifics of its DTV plans are not included. Accordingly, pursuant to Section 0.459 of the Commission's rules, Mission hereby requests that the Commission keep confidential the attached, unredacted copy of its request for extension of time to construct full-power DTV facilities for its stations and that it not be made available to the general public. (A redacted copy, removing the sensitive financial information, has been submitted into ECFS.)

Please address any questions concerning this request, and all correspondence related to the matter, to Elizabeth Hammond of this firm at (202) 842-8843 or to the undersigned.

Very truly yours,


Howard M. Liberman

cc: Shaun Maher (Video Services Division)

Mission

Broadcasting, Inc.

June 30, 2006

Via ECFS and Electronic Mail

Ms. Marlene Dortch
Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, SW
Washington, DC 20554

Re: Request for Extension of Time to Construct Full-Power DTV Facilities and
Continuing Special Temporary Authority and Request for Confidential
Treatment, MB Docket 03-15

Dear Ms. Dortch:

Mission Broadcasting, Inc. ("Mission"), the licensee of the television stations listed on Attachment 1 hereto, hereby requests an extension of the July 1, 2006 replication/maximization interference protection deadline to construct full-power digital facilities for these stations.

On August 4, 2004, the Commission established July 1, 2006 as the deadline by which digital television stations are required to increase their power levels to replicate their analog facilities (or maximize digital operations), or else lose their interference protection for the un-served areas. *Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, 19 FCC Rcd 18279, para. 78. However, the Commission further stated that it was "adopting a waiver process for stations that truly cannot afford to build out these minimum requirements, or that cannot build out for other reasons beyond their control." *Id.* at para. 83. *See also Public Notice DA 06-1255* (rel. June 14, 2006).

Mission Broadcasting...it's our mission to care

7650 Chippewa Road, Suite 305 Brecksville, Ohio 44141-2319
Phone: 440-526-2227 Fax: 440-546-1903

Mission is the licensee of 13 full-power television stations, operating in DMAs 53-195. Prior to July 1, 2005, Mission requested an extension of the July 1, 2005 replication/maximization construction deadline for its two top-four affiliated stations in the top 100 markets: WYOU, Scranton, Pennsylvania and KOLR, Springfield, Missouri. Mission subsequently has initiated full-power DTV broadcasts for WYOU-DT. Mission also is broadcasting full-power DTV signals for its stations WUTR, Utica, New York and WTVO, Rockford, Illinois. Mission is broadcasting a low-power DTV signal for all of its remaining stations.

As Mission stated in its 2005 waiver request, Mission is party to shared services agreements with Nexstar Broadcasting, Inc. ("Nexstar") for its stations. In order to minimize the expense and burden associated with the conversion of its stations to full-power digital operations, Mission requested that Nexstar work with Mission to develop a feasible full-power conversion plan for Mission's stations. In November 2004, with Mission's consent, Nexstar retained AZCAR and Morrison Hershfield Corporation (collectively "AZCAR") to survey Mission's towers, review Mission's low-power DTV operations and full-power construction permits, and develop a master plan to convert Mission's stations to full-power digital operations. AZCAR presented its initial report in March 2005. AZCAR determined that all of Mission's tower structures require either strengthening or replacement before the installation of full-power DTV equipment. AZCAR estimated that the cost of these tower repairs/replacements will be approximately \$ [REDACTED] (including WYOU-DT). Attached hereto as Attachment 2 is a letter from Morrison Hershfield providing detailed information with respect to the required upgrades and/or repairs to each of Mission's towers, which includes a tentative schedule for completing such actions.

Based on AZCAR's proposed construction plan, Mission has executed contracts with Acrodyne and Thales Broadcast & Multimedia for transmitters, with Dielectric for antennas and transmission line, and with Micro Communications, Inc. for RF systems. When Mission is ready to construct the full-power facilities for its stations it will execute contracts, on a station-by-station basis, for the needed repairs and upgrades for its towers.

AZCAR's analysis also estimated that the equipment (antennas, transmitters, encoders, transmission line and non-tower site upgrades) necessary to initiate full-power broadcasting for Mission's stations, other than WUTR and WTVO, will cost approximately \$ [REDACTED]. AZCAR further estimated that Mission will have to spend approximately \$ [REDACTED] in engineering and consulting fees to bring the stations to full-power digital operation. Based on the AZCAR analysis, Mission believes it will cost approximately \$16,620,000 (including the costs for tower upgrades) to convert its stations (including WYOU-DT, but excluding WUTR and WTVO) to full-power digital operations. Mission spent approximately \$576,050 to construct the full-power DTV facilities for WYOU-DT and has spent approximately \$475,000 toward the construction of its remaining stations.

Mission is committed to constructing full-power digital operations for its stations as expeditiously as possible. However, Mission's financial situation does not allow it to undertake such a large expenditure in any given year. As of March 31, 2006, Mission had approximately \$171,837,000 in outstanding debt. Mission is not in a position to incur additional debt under its loan agreement or through the issuance of bonds for capital expenditures in the amount required to complete full-power DTV facilities for its remaining stations. Therefore, Mission is funding its full-power DTV conversion from its available working cash-flow.

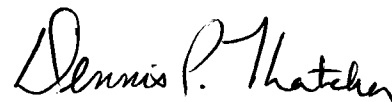
In order to meet its other payment obligations (including payroll, programming and debt service costs) from its available cash flow, Mission has developed a timetable for conversion of its stations to full-power operations based on its overall projected cash-flow and expenses. While there are variables beyond Mission's control, such as weather delays and manufacturers' scheduling conflicts, Mission anticipates that it will be able to initiate full-power digital operations for on the schedule set forth in Attachment A.

Based on the foregoing, Mission submits there is good cause for continuing waiver of the July 1, 2005 deadline for KOLR-DT and for waiver of the July 1, 2006 replication/maximization deadline with respect to the stations listed in Attachment 1. Such action is in the public interest as it will allow Mission to provide the public with digital services prior to the February 2009 transition date. Mission also requests a further extension of special temporary authority to continue operating the stations listed in Attachment 1 with the facilities specified in their requests for special temporary authority until such time as the stations' full-power DTV facilities are constructed.

In accordance with Public Notice DA 06-1255, Mission is submitting an application on Form 337 for extension of construction permit for each of the stations listed in Attachment 1.

Please address any questions concerning this request for extension of time to Mission's counsel, Howard Liberman or Elizabeth Hammond of Drinker Biddle & Reath LLP, at (202) 842-8800.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Dennis P. Thatcher". The signature is fluid and cursive, with the first name "Dennis" being the most prominent.

Dennis P. Thatcher
Executive Vice President
& Chief Operating Officer

cc: Shaun Maher (Video Services Division)

ATTACHMENT 1

<u>Station</u>	<u>DTV Construction Permit</u>	<u>DTV STA</u>	<u>Anticipated Construction Date</u>
KOLR-DT	BMPCDT-20050701ACB	BEDSTA-20050627ADW	December 2006
KRBC-DT	BMPCDT-20040802AMT	BEDSTA-20050822BLS	February 2007
KAMC-DT	BPCDT-19990305KF	BEDSTA-20060526ALL	August 2007
KCIT-DT	BPCDT-19991029AIB	BEDSTA-20060526ALI	August 2007
KODE-DT	BPCDT-19991022AAV	BEDSTA-20051021AHH ¹	August 2008
WFXW-DT	BMPCDT-19991101AJG	BEDSTA-20060207ACL	August 2008
KHMT-DT	BPCDT-19991101AKB	BEDSTA-20060526ALK	August 2008
KJTL-DT	BPCDT-19991102ABG	BEDSTA-20060526ALJ	October 2008
WFXP-DT	BPCDT-19991103ABO	BEDSTA-20060117AGE	October 2008
KSAN-DT	BMPCDT-20040802AMM	BEDSTA-20050822BLT ²	December 2008

¹ This extension of special temporary authority expired on June 19, 2006. Mission inadvertently did not submit a further request for extension of STA, but hereby does make a request pursuant to this letter.

² This extension of special temporary authority expired on May 3, 2006. Mission submitted a further request for extension of STA on May 2, 2006; however, this request is not yet reflected in CDBS.



June 23, 2006

Mr. Dennis Thatcher
Mission Broadcasting, Inc.
7650 Chippewa Road
Suite 305
Brecksville, Ohio 44141-2319

Re: Tower Upgrades

Dear Dennis:

As part of our comprehensive analysis for Mission's full-power DTV television build-out we have determined that a number of your stations' antenna structures require strengthening or replacement prior to the installation of the equipment necessary for full-power DTV operations. Below is a summary of the current status of Mission's antenna structures, which are in need of repair before installing additional DTV equipment, a description of the work, required and an estimate of the time required to make the required repairs once work is begun.

Springfield (KOLR) – The equipment for the DTV operations for both KOLR and KSMX, which is owned by Nexstar Broadcasting, is being combined on KOLR's tower. This tower is moderately overstressed for the DTV antenna installation. The tower will require addition of mid-panel bracing from 15 to 44 ft above grade, 254 to 284 ft above grade and from 704 to 711 ft above grade. In addition, re-tensioning of all guy wires will be required as well. We anticipate the total duration of engineering, material fabrication and construction to take approximately six months.

Erie (WFXP) – The equipment for the DTV operations for WFXP is being mounted on a tower owned by Nexstar Broadcasting. This tower is moderately overstressed for the DTV antenna installation. The tower will require replacement of top guy levels 5 and 6, addition of mid-panel bracing for twenty panels, replacement of fifteen bays of diagonals and replacement of eight levels of horizontals. We anticipate the total duration of engineering, material fabrication and construction to take approximately six months.

Abilene (KRBC) – This tower is moderately overstressed for the DTV antenna installations. The tower will require new torsion resistors and new guy wires at 160 ft and 460 ft above grade. In addition, mid-panel bracing will be required between 60 and 80 ft above grade. We anticipate the total duration of engineering, material fabrication and construction to take approximately six months.

Lubbock (KAMC) – The equipment for the DTV operations for KAMC is being mounted on a tower owned by Nexstar Broadcasting. This tower is moderately overstressed

for the DTV antenna installations. The tower will require bracing of the leg members over four levels, reinforcement of two levels of horizontal struts and re-tensioning of all guy wires. We anticipate the total duration of engineering, material fabrication and construction to take approximately five months.

Amarillo (KCIT) – This tower is moderately overstressed for the DTV antenna installation. The tower will require mid-panel bracing over twelve panels, four levels of diagonal replacement, three levels of strut replacement and re-tensioning of all guy wires. We anticipate the total duration of engineering, material fabrication and construction to take approximately six months.

Joplin (KODE) – This tower is significantly overstressed for the DTV antenna installation. The tower will require replacement of the top guy level, addition of mid-panel bracing for thirty panels, replacement of twenty bays of diagonals and replacement of ten levels of horizontals. We anticipate the total duration of engineering, material fabrication and construction to take approximately seven months.

Wichita Falls (KJTL) – This tower is severely overstressed for the DTV antenna installation. The tower will require sixty-six bays of leg bracing, ten bays of diagonal replacement and four levels of guy replacement. We anticipate the total duration of engineering, material fabrication and construction to take approximately eight months.

San Angelo (KSAN) – This tower is significantly overstressed for the DTV antenna installation. The tower will require three new guy anchors, new guy wires at 80 ft, 230 ft and 339 ft above grade, guy wire replacements at 158 ft, 278 ft and 398 ft above grade, leg reinforcement from base to 30 ft above grade, mid-panel bracing from base to 174 ft above grade, new diagonal bracing at select locations along the tower height and re-tensioning of all guy wires. We anticipate the total duration of engineering, material fabrication and construction to take approximately eight months.

Terre Haute (WFXW) – This tower is moderately overstressed for the DTV antenna installations. The tower will require thirty bays of leg bracing, four bays of diagonal replacement and three levels of guy wire replacement. We anticipate the total duration of engineering, material fabrication and construction to take approximately six months.

Billings (KHMT) – This tower is moderately overstressed for the DTV antenna installation. The tower will require mid-panel bracing over fifteen panels, six levels of diagonal replacement and two levels of strut replacement. We anticipate the total duration of engineering, material fabrication and construction to take approximately six months.

The engineering work and material fabrication has commenced for KOLR. This station is expected to be on air with full power DTV operations by December 2006. The engineering work has commenced for KRBC and this station is expected to be on air with full power DTV operations by February 2007.



Engineering work for KAMC, KCIT, and WFXP has commenced. KAMC and KCIT are expected to be on air with full power DTV operations by August 2007. WFXP is expected to be on air with full power DTV operations by October 2008.

Engineering work for the remaining stations, KODE, WFXW, KJTL, KSAN, KHMT, will commence in January 2007. KODE, WFXW and KHMT are expected to be on air with full power DTV operations by August 2008. KJTL and KSAN are expected to be on air with full power DTV operations by October 2008 and December 2008 respectively.

The anticipated time periods are based on our experience with similar scope of work carried out on overstressed towers. This is subject to change depending on material and crew availability as well as unforeseen weather related delays.

Sincerely,

A handwritten signature in black ink, appearing to read "Shylesh Moras", with a horizontal line underneath.

Shylesh Moras
Manager, Tower Upgrades
Morrison Hershfield Corporation
770-379-8509 (tel)
770-379-8501 (fax)

